

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20 Part A

REQUEST: CLEC Coalition, Set #2

DATED: May 15, 2001

ITEM: CC 2-44 Provide all documents, analyses, reports, studies, network planning guidelines or other memoranda describing Verizon's implementation/deployment of DSL over DLC.

REPLY: Verizon MA objects to this request on the grounds that the request is overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seeks the disclosure of confidential and commercially sensitive material. Notwithstanding this objection, Verizon MA provides the following response.

Verizon MA does not plan to offer a retail DSL over DLC service. However, Verizon MA does plan to begin to deploy NGDLC which will have the capability to be equipped with the ability to offer DSL over DLC. Verizon MA's proposals have been reviewed with the CLECs and regulatory bodies at two Verizon-sponsored industry-wide workshops. The information provided at the workshops can be found on Verizon's web page at :
http://128.11.40.241/east/wholesale/industry_conf_education/master.htm

In addition Verizon has agreed to post on the web a list of locations where there are plans to deploy NGDLC which will have DSL over DLC upgrade capability. Verizon's deployment plans are driven by growth requirements and are subject to change as actual growth varies from forecasts.

The FCC is currently reviewing existing rules which may inhibit deployment of new technology with advanced services capability in the local loop and is expected to provide an updated ruling. Verizon MA's current plans may be affected by an FCC order on this subject.

**Verizon New England Inc.
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Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

REQUEST: CLEC Coalition, Set #3

DATED: May 17, 2001

ITEM: CC 3-8 Please provide a copy of all business process and policies documentation used for UNE loop qualification (xDSL services).

REPLY: Verizon-MA objects to this request on the basis that it is overly broad and burdensome. Notwithstanding this objection Verizon MA provides the following response.

Please see Verizon MA's response to Information Request CC 3-41.

VZ # 282

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

REQUEST: CLEC Coalition, Set #3

DATED: May 17, 2001

ITEM: CC 3-41 Please provide a detailed description of the most recently planned process that VZ-MA intends or intended to use to determine if specific customers/customer locations qualify for its retail xDSL service. Please provide a complete copy of whatever documentation VZ-MA has developed for internal use that describes the current and planned future state of that process.

REPLY: Verizon MA does not offer retail xDSL service. There are, however, several processes in use today that help CLECs determine whether a specific loop is qualified for DSL.

A mechanized loop qualification process is available today. This allows CLECs to submit requests for loop qualification in an electronic manner on a preorder basis. An inquiry is made to the Verizon loop qualification database and loop qualification information, as it exists in the Verizon loop qualification database is returned to the CLEC. A description of the interface and business rules for this process is on the Verizon website www.verizon/wise.

In addition, an extract of the data contained in Verizon's loop qualification database is also provided to the CLECs. A detailed description of that process is provided in Attachment 1.

When loop qualification information does not exist in the Verizon loop qualification database, a CLEC may request a manual loop qualification process by submitting an LSR for DSL and indicating that a manual loop

REPLY: CC 3-41 (cont'd) In October 2001, Verizon MA is planning to mechanize the request for a manual loop qualification. This will allow CLECs to submit an electronic request to Verizon MA for a manual loop qualification on a preorder basis. Information regarding this process was shared with the CLECs in late January and early February. See Attachments 2 and 3 that describes the process.

A long-term solution for access to LFACS for loop makeup information is also being planned for October 2001. Information regarding this process has been provided to the CLECs and is contained in Attachment 2 and Attachment 4.

When a CLEC wishes more specific information about the technical characteristics of a loop associated with a working TN or address, the CLEC may submit a request for loop makeup. Today a CLEC may submit an electronic transaction to request loop makeup information as it exists in Verizon's Loop Facility Assignment and Control System (LFACS). When the information is available from LFACS, Verizon MA will return loop makeup information. Should loop makeup information not be available from LFACS, CLECs have the option of submitting an Engineering Query to Verizon. An Engineering Query provides a loop makeup response to the CLEC based on analysis and investigation of Verizon's paper records.

At the present time, Verizon MA is providing electronic access to LFACS through an interim process. Information concerning this process was shared with the CLECs in February 2001 and is provided in the following Attachments 5, 6 and 7.

The description of the manual Engineering Query process is on Verizon's Website: www.bell-atl.com/wholesale/html/customer_doc.htm

Verizon MA considers the attachments to be voluminous. A copy will be provided to the Department and will be made available to other parties for review at its offices at 125 High St., in Boston, Massachusetts.

**Verizon New England Inc.
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Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

REQUEST: CLEC Coalition, Set #3

DATED: May 17, 2001

ITEM: CC 3-43 Please provide a complete copy of all internal documentation related to plans to mechanize any portion of VZ-MA's systems and processes to qualify loops for xDSL service(s).

REPLY: Verizon MA objects to this request on the grounds that it is unduly burdensome. Notwithstanding these objections, Verizon MA provides the following response.

Please see Verizon MA's response to Information Request CC 3-41. All plans to mechanize or upgrade loop qualification databases or access to loop makeup information are provided to the CLECs through the Change Management process. The CLECs participate in this process to prioritize updates to Verizon's wholesale services systems.

**Verizon New England Inc.
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Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

REQUEST: CLEC Coalition, Set #3

DATED: May 17, 2001

ITEM: CC 3-44 Please provide a complete copy of all internal documentation related to plans to mechanize any portion of VZ-MA's systems and processes to qualify loops for xDSL service(s).

REPLY: Please see Verizon MA's response to Information Request CC 3-43.

VZ # 318

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20

Respondent: Dinell Clark

Title: Staff Director

REQUEST: CLEC Coalition, Set #4

DATED: May 25, 2000

ITEM: CC 4-1 Please provide all data, workpapers and other studies relied upon by Wholesale marketing in determining the level of the Engineering and Administration Fees for each form of collocation. (See page 6 of collocation testimony.)

REPLY: Page 6 of Ms. Clark's testimony addresses the "Application Fee".

Workpaper Part CA, Exhibit, page 1 of 2 identifies the four application fees associated with Physical collocation. The Application Fee recovers a portion of the Engineering and Administration charges. It is reasonable for Verizon MA to require CLECs to pay for a part of the cost of construction or other nonrecurring costs before commencement of work.

VZ # 397

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20

REQUEST: CLEC Coalition, Set #4

DATED: May 25, 2000

ITEM: CC 4-11 Please discuss what provisions exist for reimbursing a CLEC for space conditioning charges in the event the CLEC discontinues its collocation arrangement. Does the CLEC receive any money back? Unless the answer is an unqualified no, please discuss in detail by how much and under what terms VZ-MA proposes to reimburse the CLEC.

REPLY: No. Please see Part E, Section 2.2.8 of the DTE 17 Tariff, Reclamation of Space/Right to terminate or Rearrange.

VZ # 407

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20

REQUEST: CLEC Coalition, Set #4

DATED: May 25, 2000

ITEM: CC 4-12 Please discuss whether and under what conditions a CLEC is allowed to sublet its collocation space to another CLEC.

REPLY: Please See Part E, Section 8.1 of the DTE 17 Tariff, Subleasing Arrangement.

VZ # 408

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20

Respondent: Dinell Clark
Title: Staff Director

REQUEST: CLEC Coalition, Set #4

DATED: May 25, 2000

ITEM: CC 4-27 Please discuss in detail whether and how VZ-MA considers the distance between the collocation spaces in the central office to the appropriate Verizon MA power source when VZ-MA plans its collocation spaces. Please provide all workpapers, studies and other documents that show how VZ-MA considers this issue in planning collocations spaces.

REPLY: Verizon MA uses engineering judgment to select the appropriate collocation space based on proximity to power, MDF and DSX terminations, available HVAC, access to elevators and main building entrances, and availability of central office space.

VZ # 423

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20

REQUEST: CLEC Coalition, Set #4

DATED: May 25, 2000

ITEM: CC 4-29 Please provide any tables, charts, spreadsheets, or any other reports, whether in paper or electronic form, previously prepared by VZ-MA that compare current recurring and nonrecurring tariff rates to those rates proposed by VZ-MA on May 8, 2001 in this Proceeding. If an individual table, chart, spreadsheet, or report, does not contain all of this information, please provide any separate tables, charts, tables, or reports that contain any portions of this information.

REPLY: Please see Verizon MA's response to Information Request ATT 5-13.

VZ # 425

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Michael J. Anglin
Title: Director – Service Costs

REQUEST: CLEC Coalition, Set #7

DATED: June 8, 2001

ITEM: CC 7-1 Please provide copies of all work papers showing the development of the CC/BC ratios found on the Microsoft Excel file “MA 2000 CC-BC Ratio.xls” contained on the CD-ROM supporting Part G (Investment Loadings) to Verizon’s Initial Panel Testimony. Supporting work papers should include the Telephone Plant Indices (TPIs) and plant investment by vintage for the following plant categories.

Digital Switching
Operator Systems
Radio Systems
Circuit Equipment
Analog Circuit
Other Terminal Equipment
Poles
Aerial Cable - Metallic
Aerial Cable - Non-Metallic
U.G. Cable - Metallic
U.G. Cable - Non-Metallic
Buried Cable - Metallic
Buried Cable - Non-Metallic
Submarine Cable
Intrabuilding Cable - Metallic
Intrabuilding Cable - Non-Metallic
Conduit Systems.

REPLY: Verizon Massachusetts objects to this request on the grounds that the request is not reasonably calculated to lead to the discovery of admissible evidence. The file containing the CC-BC ratios was mistakenly included in the filing. The CC-BC ratios are not actually used in the development of the investment loadings.

VZ # 511

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Michael J. Anglin
Title: Director – Service Costs

REQUEST: CLEC Coalition, Set #7

DATED: June 8, 2001

ITEM: CC 7-2 Has Verizon included any Special Pension Enhancement payments in any of its cost model calculations and annual charge factors? If yes, please explain why.

REPLY: No.

VZ # 512

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Michael J. Anglin
Title: Director – Service Costs

REQUEST: CLEC Coalition, Set #7

DATED: June 8, 2001

ITEM: CC 7-3 Please provide all work papers and supporting calculations in electronic form documenting Verizon's inclusion of realized and expected savings from the merger of Bell Atlantic with GTE in its calculation of UNE costs and related charge factors. If Verizon has not included merger savings in its UNE cost development, please explain why.

REPLY: Verizon MA has not explicitly included a calculation of merger savings in its cost studies. Savings of this type are implicitly included in the productivity indices used in the development of Annual Cost Factors.

